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Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

NAVAJO HEALTH FOUNDATION – SAGE  
MEMORIAL HOSPITAL, INC. (doing  
business as “Sage Memorial Hospital”); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as “Razaghi Healthcare”),  
AHMAD R. RAZAGHI; individually, TAUSIF  
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**JOINT STIPULATION TO EXTEND  
PLAINTIFF’S TIME TO RESPOND TO  
DEFENDANTS’ MOTION TO STAY  
DISCOVERY AND FOR RULE 11  
SANCTIONS**  
**(FIRST REQUEST)**

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 6 and the Court’s Local Rule of Civil Practice 7-1, the parties hereby stipulate, subject to the Court’s approval, to permit Plaintiff additional time, to and until April 1, 2022, to respond to Defendant’s motion to stay discovery (ECF No. 170) and for FRCP 11 sanctions (ECF No. 174). Presently, Plaintiff’s response to the motion to stay discovery is due today and the response to the FRCP 11 sanctions motion is due on March 24, 2022. This is Plaintiff’s first request for an extension of time for the reasons cited herein.

In support of this Stipulation, the parties agree to the following:

1. Good cause exists to support this request for additional time. The parties have discussed the pending motions and counsel for Plaintiff has notified counsel for Defendants that due to competing case commitments (including out of town travel for depositions in another case being handled by Paul S. Padda, Esq.), work obligations and an upcoming medical appointment (i.e. surgery) for Kathleen Bliss, Esq. additional time is needed to properly respond to the pending motions. This additional time will permit counsel for Plaintiff to complete responses to the pending motions, coordinate their review between Plaintiff’s counsel and then file them with the Court.

2. Counsel for the respective parties have communicated regarding this Stipulation and agree that an extension of time to and until April 1, 2022 is appropriate under the circumstances.

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The parties respectfully request the Court approve this Stipulation.

/s/ Kris Leonhardt

/s/ Paul S. Padda

Pavneet S. Uppal, Esq.  
Kris Leonhardt, Esq.  
Jeffrey D. Winchester, Esq  
*Counsel for all named Defendants*

Kathleen Bliss, Esq.  
Paul S. Padda, Esq.  
David Stander, Esq.  
Douglass A. Mitchell, Esq.  
*Counsel for Plaintiff,  
Counterdefendant and Third-Party  
Defendants*

Dated: March 21, 2022

Dated: March 21, 2022

**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED: March 22, 2022**